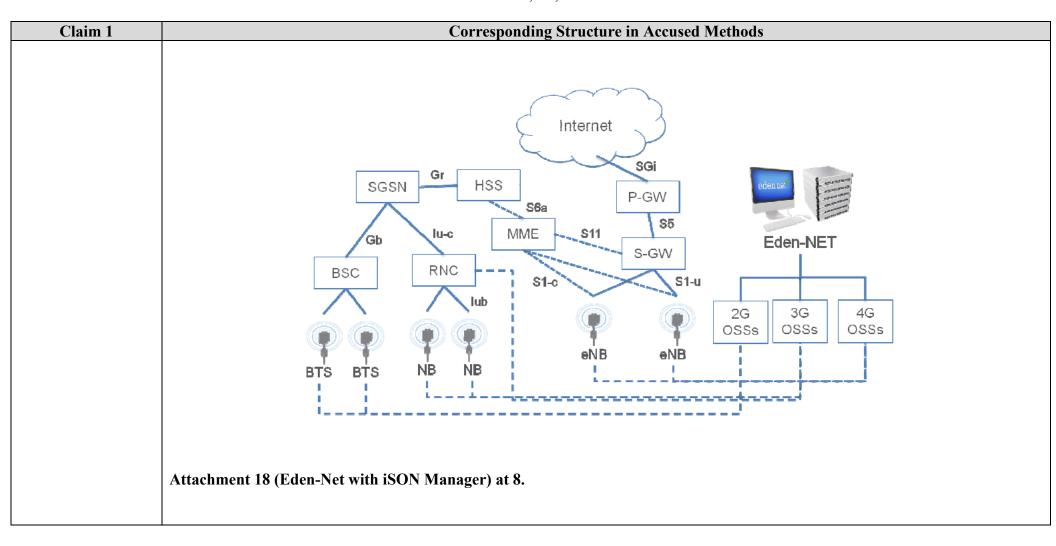
Claim 1	Corresponding Structure in Accused Methods	
1. A method of providing navigation assistance to a user	T-Mobile (including Metro PCS) wireless telecommunications network including the E911 service (including the infrastructure to provide the service) that the said wireless network provides, constitutes the "Accused Method".	
of a communications device, the method comprising:	The "method of providing navigation assistance to a user of a communications device" refers to the method by which T-Mobile's E911 provides navigation assistance (directions) to a user of a communications device (example: mobile phone, smartphone, laptop, tablet, PC etc.).	
	The said "communications device" (the user of the said "communications device") is a subscriber of T-Mobile (including Metro PCS) wireless telecommunications network services and T-Mobile E911 service.	
	Further, T-Mobile E911, Wi-Fi Calling solution also provides navigation assistance (directions) to a user of a communications device (example: mobile phone, smartphone, laptop, tablet, PC etc.) including the (E911, Wi-Fi Calling solution) or including a browser plugin enabling access to the (E911, Wi-Fi Calling solution) website, for querying and receiving navigation instructions from a starting location (current location of the communications device) to a destination location.	
	T-Mobile USA uses Nokia Eden-NET SON for optimizing the performance of its wireless telecommunications network. The said wireless telecommunications network being any or any combination of GSM, WCDMA and LTE (2G, 3G, 4G and LTE) wireless networks. For this purpose, Nokia Eden-NET SON is integrated or interfaced with T-Mobile's wireless telecommunications network. When integrated or interfaced with the said wireless telecommunications network, Nokia Eden-NET SON imparts Self-Optimizing or Self-Organizing Network capabilities to the said wireless telecommunications network.	
	The term "wireless network" refers to T-Mobile USA's wireless telecommunications network interfaced/integrated and enabled with Nokia Eden-NET SON .	
	Plaintiff contends that a system of computers comprises wireless device location elements, including but not limited to one or more of position determination entities (PDE), mobile location/positioning centers, mobile switching center, location proxy servers, locations applications, location agents, GPS server, Wi-Fi server, home location register, visiting location register, one or more of which are used in locating a wireless device. The various location elements are T-Mobile components, T-Mobile subsidiaries or family of companies, vendors, partners and the like. The various location elements are meant to work across one or more of all technologies, including 2G, 3G, 4G, and 5G.	

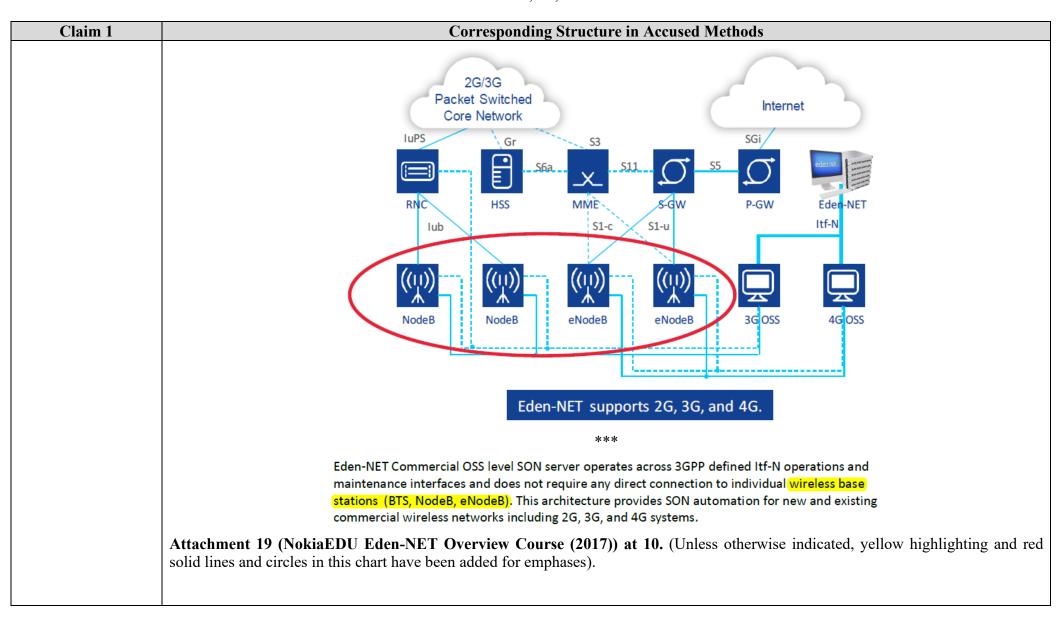
Claim 1	Corresponding Structure in Accused Methods	
Claim 1	The following exemplifies the existence of this limitation in Accused Method: Network Architecture Attachment 12 (Journey to 5G –T-Mobile US Perspective) at 11.	
	Attachment 12 (Journey to 5G –T-Mobile US Perspective) at 11.	

Claim 1	Corresponding Structure in Accused Methods		
	CommsMEA staff writer, June 14th, 2016 Henrique Do Vale, head of sales, applications and analytics, MEA, Nokia explains how Nokia Eden-NET SON solution allows operators to innovate on top of the open framework. CommsMEA: Tell us about Nokia Eden-NET? Nokia Eden-NET is a leading Self-Organising Network (SON) solution in the industry with a truly multivendor and multi-technologies approach and a most user-friendly GUI interface. Nokia EdenNET SON can run in open loop or with close loop mode, fully automated and with minimum intervention. Nokia believes that service providers should leverage SON for all network and all layers of radio technology, since it leads to better network quality and better network availability for the end user.		
	T-Mobile USA has been leveraging Nokia Eden-NET SON. During T-Mobile's SON evaluation process, Eden-NET SON solution simultaneously ensured dropped calls are only fewer, increased throughput, and reduced leakage – even as measured across entire markets, which had been previously well optimised. With Eden-NET SON solution T-Mobile has seen improvements in its network. Another leading operator has achieved the following by deploying Nokia Eden-NET SON: improvement of handover success-rate by 20%; 5% improvement on voice capacity (Voice Erlangs); 15% reduction in dropped call rates to name a few indicators. These improvements have directly translated into Opex and Capex efficiencies, along with customer satisfaction and bringing a positive impact on its revenues. Attachment 16 (Enhanced agility for evolving networks) at 1.		

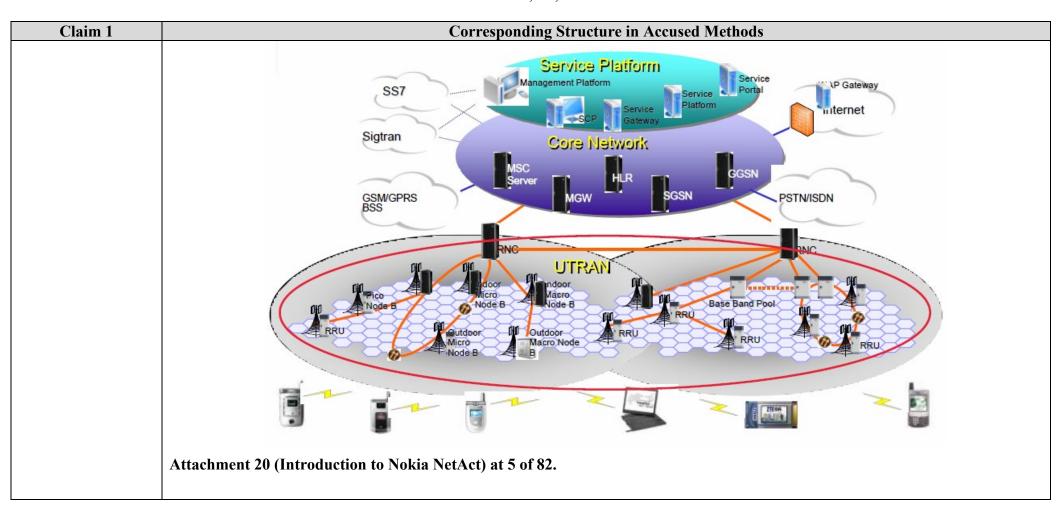
Claim 1	Corresponding Structure in Accused Methods		
	Eden-NET, is a new layer of cloud software intelligence for GSM,WCDMA, and LTE wireless networks. Eden-NET performs centralized, multi-vendor, multi-technology Self Organizing Networks (SON). It dynamically adapts wireless networks to optimally meet the demands of active subscribers. With its comprehensive external systems integration and patented SON algorithms, Eden-NET performs autonomous network optimizations, workflow automation, network reliability automation, and dynamic network adaptation. The solution provides a complete SON operating system as well as an established toolbox of essential SON Modules. Eden-NET is highly extensible, enabling effective customization of existing SON modules and creation of new SON modules. It provides a data adapter functionality block, offering its services through a specific API following a Service Oriented Architecture Model.		
	The Eden-NET architecture and functionality have been influenced by leading mobile operators to fully meet their needs and it has been field-proven. Eden-NET delivers the ultimate in mobile network performance, reliability, and operational efficiencies. Attachment 17 (Eden NET Lister Guide): at 8 of C) – A centralized SON solution for autonomously optimizing performance of wireless cellular telecommunications networks (Example: GSM, WCDMA and LTE wireless networks). {Source: Attachment #7 (Pg. 8)}		

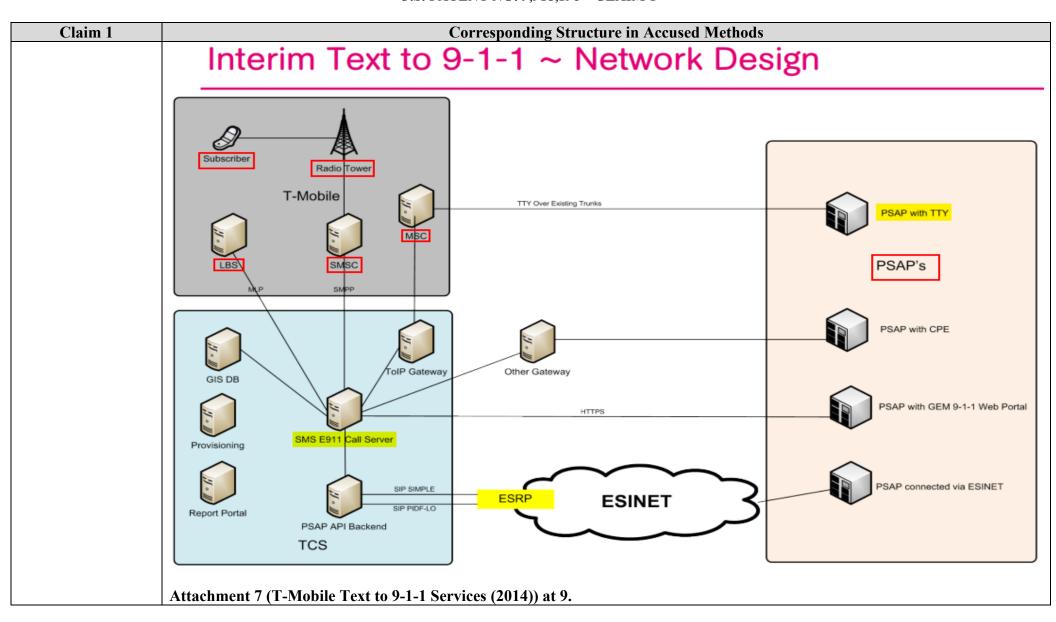
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Claim 1	Corresponding Structure in Accused Methods		
	What is Basic 9-1-1 service?	~	What is Enhanced 9-1-1 Phase II service?
	What is Enhanced 9-1-1 Phase I service? Enhanced 9-1-1 Phase I service is the first step in providing better emergency response service to wireless 9-1-1 callers. Public Safety/9-1-1 Communications Centers need to send a letter to T-Mobile requesting Phase I service deployment at their agency. Once Phase I service has been implemented, when a wireless 9-1-1 call comes into the 9-1-1 Communications Center (also called a Public Safety Answering Point or PSAP), the call-taker's computer screen will show the wireless phone's 10-digit call-back number if one has been assigned to the calling handset. In the event the wireless phone call is dropped, the call-taker may contact the caller. Phase I service also identifies the cell site/sector location information that the call was originated on to the call-taker's computer screen. This provides the call-taker with a general location		Public Safety/9-1-1 Communications Centers need to send a letter to T-Mobile requesting Phase II service deployment at their agency. With Phase II service, the location information that is provided to the 9-1-1 Communications Center is the approximate X, Y (longitude, latitude) location of the handset making the 9-1-1 call. This location information is typically more accurate than the Phase I location information (cell site/sector). As with Phase I, Phase II service allows call-takers to receive both the caller's wireless phone number and their estimated location information. Since early 2004, T-Mobile has been deploying Phase II services. T-Mobile utilizes a hybrid solution, referred to as U-TDOA, Uplink-Time Difference of Arrival and AGPS, Assisted Global Positioning System, to provide an estimated Phase II location to the 9-1-1 Communications Center. The handset must have battery power and be in a coverage area to complete a 9-1-1 call.
	(i.e. within the site coverage area) of the caller. The handset must have battery power and be in a coverage area to complete a 9-1-1 call.		What is Text to 9-1-1 service?
	Attachment 9 (9-1-1 safety (webpage, 2019)) at 2.		

Claim 1	Corresponding Structure in Accused Methods			
	What level of 9-1-1 service will I receive using WiFi Calling			
	service?			
	When you make a 9-1-1 call with a WiFi Calling enabled phone, your			
	phone will first attempt to complete the call like any other phone in			
	the T-Mobile network. Depending on the capabilities of your local 9-			
	1-1 Communications Center, you may receive Wireless Enhanced			
	Phase I, Phase II, or Basic 9-1-1 service as described above.			
	T-Mobile works very closely with the 9-1-1 Communication Centers			
	to deploy the best possible 9-1-1 service supported by the 9-1-1			
	Communication Centers. If you are at your registered location (as			
	described above) and wireless coverage is unavailable, your phone			
	will try to complete the 9-1-1 call using special WiFi Calling			
	functionality. Your location is one of a number of methods which			
	may be used to route your 9-1-1 call and provide your location to the			
	designated 9-1-1 Communications Center. Therefore, it is very			
	important to keep the registered address information current. Your			
	location information can be provided and/or updated by accessing			
	your account at My T-Mobile or by contacting T-Mobile Customer			
	Care.			
	Attachment 9 (9-1-1 safety (webpage, 2019)) at 7, 8.			

Corresponding Struct	ure in Accused Methods
330 Million Americans Rely on Enhanced	Looking to the Futu
911 Services	According to 911.gov:
Mobile phones play an important role in personal and public safety, allowing people to easily reach out to emergency services, family or friends. Mobile connectivity can be a lifeline for people and first responders when reacting to natural and man-made disasters, as well as accidents and threats to communities.	For more than 40 years, the 91 public in emergencies. Next Ge 911 system to create a faster, muthat allows 911 to keep up with public.
Enhanced 911 (also called E911) is a federally-mandated program that seeks to improve the accuracy and reliability of wireless 911 by providing dispatchers with additional location information. E911 is regulated by the Federal Communications Commission and is initiated by jurisdictional request.	While the technology to implement the transition to NG911 involves Implementing NG911 will include coordinate efforts to plan and a hardware, software, standards,
The deployment of E911 requires network upgrades and coordination among public safety agencies, wireless carriers, technology vendors, equipment manufacturers, and local wireline carriers.	The National 911 Program support of government as they consider
240 million calls are made to 911 in the U.S. each year, and in many areas 80% or more are from wireless devices. (National Emergency	New technologies and policies capabilities. In fact, a roadmap industry and public safety advocaccurately locating indoor 911 estimate for callers in high-rise left.
	330 Million Americans Rely on Enhanced 911 Services Mobile phones play an important role in personal and public safety, allowing people to easily reach out to emergency services, family or friends. Mobile connectivity can be a lifeline for people and first responders when reacting to natural and man-made disasters, as well as accidents and threats to communities. Enhanced 911 (also called E911) is a federally-mandated program that seeks to improve the accuracy and reliability of wireless 911 by providing dispatchers with additional location information E911 is regulated by the Federal Communications Commission and is initiated by jurisdictional request. The deployment of E911 requires network upgrades and coordination among public safety agencies, wireless carriers, technology vendors, equipment manufacturers, and local wireline carriers.

Looking to the Future

For more than 40 years, the 911 system has served the needs of the public in emergencies. Next Generation 911 (NG911) will enhance the 911 system to create a faster, more flexible, resilient, and scalable system that allows 911 to keep up with communication technology used by the public.

While the technology to implement NG911 systems is available now, the transition to NG911 involves much more than just new computers. Implementing NG911 will include activities of many people, who will coordinate efforts to plan and deploy a continually evolving system of hardware, software, standards, policies, protocols and training.

The National 911 Program supports the effort of jurisdictions at all levels of government as they consider the transition to NG911.

New technologies and policies will continue to enhance these capabilities. In fact, a roadmap agreement reached by the wireless industry and public safety advocates in late 2014 will lead to more accurately locating indoor 911 callers, as well as providing a vertical estimate for callers in high-rise buildings.

67. 4			
Claim 1	Corresponding Structure in Accused Methods		
receiving, by a	The term "directional assistance service" herein refers to T-Mobile's E911 services.		
directional assistance			
service, an Internet	The method of using the E911 for Navigation includes initiating a query at the communications device to initiate a request for		
query initiated at the	navigational assistance to a destination, by specifying (inputting) the destination.		
communications			
device and directed	The said query is directed via the Internet to the remote E911 server. In other words, the E911 service receives the said query thro		
via the Internet to	the Internet.		
initiate a request for			
navigational	Further, E911, Wi-Fi Calling Solution Navigation includes initiating a query at the communications	device to initiate a request for	
assistance to a	navigational assistance to a destination, by specifying (inputting) the destination.		
destination;			
	The following exemplifies this limitation's existence in Accused Method:	E011	
		E911 received query by	
	Interim Text to 9-1-1 ~ 3 Methods	a different method. E.g. Web service, TTY and	
		NENA.	
		INLINA.	
Interim Text to 9-1-1 service will be delivered via one of the follow ways:		ne following	
		occaso via an	
	* Web Services Method ~ The PSAP will receive SMS m	essage via all	
	Internet portal, which requires a computer(s) with Internet	access.	
	TTY Method ~ The PSAP will receive SMS messages (converted to	
	ASCII) via existing 9-1-1 facilities, which may require add	itional trunking to	
		ilional trunking to	
	the PSAP.		
	❖NENA i3 / ESInets / MSRP Method ~ The PSAP will red	reive SMS	
	messages via Message Session Relay Protocol to an Em	organov Sarvicas	
		lergency Services	
	IP Network.		
	Attachment 7 (T-Mobile Text to 9-1-1 Services (2014)) at 5.		
	Tittachinent / (1-1/100me 1eat to)-1-1 Scryices (2017)) at 3.		

Claim 1 Corresponding Structure in Accused Methods	Corresponding Structure in Accused Methods		
Interim Text to 9-1-1 ~ PSAP Requirement	S		
PSAP Requirements for the Web Services Method:			
-Public Internet Access			
-Bandwidth: At least 1.5 Mb/s / Business class			
-Provide public IP addresses (Static IP's for access to TCC's 9-1-1 sites)			
 -Web browser capability (Internet Explorer 8, Chrome or Firefox) If a firewall in place, PSAP must allow access to TCC IP addresses 			
-Verify/Provide GIS boundary for PSAP			
-Sign End User License Agreement & Create user logins			
PSAP Requirements for the TTY Method:			
-Existing Selective Router and ALI connectivity			
-Customer Premise Equipment with TTY capability			
-Public Internet Access			
-Provide public IP addresses (Static IP's for access to TCC Admin site)			
 Web browser capability (Internet Explorer 8, Chrome or Firefox) If a firewall is in place, PSAP must allow access to TCC IP addresses and websites 			
-Verify/Provide GIS boundary for PSAP			
-Augment trunking from Selective Router?			
PSAP Requirements for the NENA i3 / ESInets / MSRP Method:			
-PSAP connectivity to the ESInet			
-Provide PSAP/ESInet Provider boundaries & IP addresses			
-IP capable CPE			
I.d. at 6.			

Claim 1 **Corresponding Structure in Accused Methods** 330 Million Americans Rely on Enhanced **Looking to the Future** 911 Services According to 911.gov: Mobile phones play an important role in personal and public safety, For more than 40 years, the 911 system has served the needs of the allowing people to easily reach out to emergency services, family public in emergencies. Next Generation 911 (NG911) will enhance the or friends. Mobile connectivity can be a lifeline for people and first 911 system to create a faster, more flexible, resilient, and scalable system responders when reacting to natural and man-made disasters, as well as that allows 911 to keep up with communication technology used by the accidents and threats to communities. public. Enhanced 911 (also called E911) is a federally-mandated program that While the technology to implement NG911 systems is available now, seeks to improve the accuracy and reliability of wireless 911 by providing the transition to NG911 involves much more than just new computers. dispatchers with additional location information. E911 is regulated by the Implementing NG911 will include activities of many people, who will Veral Communications Commission and is initiated by jurisdictional coordinate efforts to plan and deploy a continually evolving system of hardware, software, standards, policies, protocols and training. First responder gets nt of E911 requires network upgrades and coordination the location The National 911 Program supports the effort of jurisdictions at all levels safety agencies, wireless carriers, technology vendors, information on their of government as they consider the transition to NG911. communication nufacturers, and local wireline carriers. device. New technologies and policies will continue to enhance these capabilities. In fact, a roadmap agreement reached by the wireless industry and public safety advocates in late 2014 will lead to more 240 million calls are made to 911 in the U.S. accurately locating indoor 911 callers, as well as providing a vertical each year, and in many areas 80% or more are estimate for callers in high-rise buildings. from wireless devices. (National Emergency Number Association, NENA) Attachment 4 (Smart Communities plan for mobile) at 1.

Claim 1

Corresponding Structure in Accused Methods



First responder communications device initiates a request for navigational assistance.



Emergency communications

A tornado has just hit a small, rural town, leaving many people injured and missing; gas mains are leaking; power lines are down and cell towers are out of service. An emergency command center must be established close to the site with a communications network so administrators can coordinate the various agencies rushing in to help.

T-Mobile's emergency communications solution lets first responders set up a base station out of the trunk of a vehicle, if needed, using trunk-based routers and satellite communication links to establish a secure, five-mile Wi-Fi zone. This lets police, fire, medical personnel, utility workers, volunteers and others coordinate their efforts and find ways to help the public throughout the emergency.

Whether due to a natural disaster, a terrorist attack or other situations requiring emergency response deployments, communications continuity is mission critical. And T-Mobile is here to help facilitate the mission.

T-Mobile and its trusted partners offer an emergency communications solution, which can include:*

- Fleet of Wi-Fi-capable devices
- Wireless priority access
- Wi-Fi Calling
- Routers in vehicles producing Wi-Fi (radius of up to 5 miles)
- Satellite communications link
- External antenna
- GSM Command Phone 3-watt base station with cordless handsets (911 backup)
- Dedicated account team

Attachment 3 (Emergency response communications (2013)) at 2.



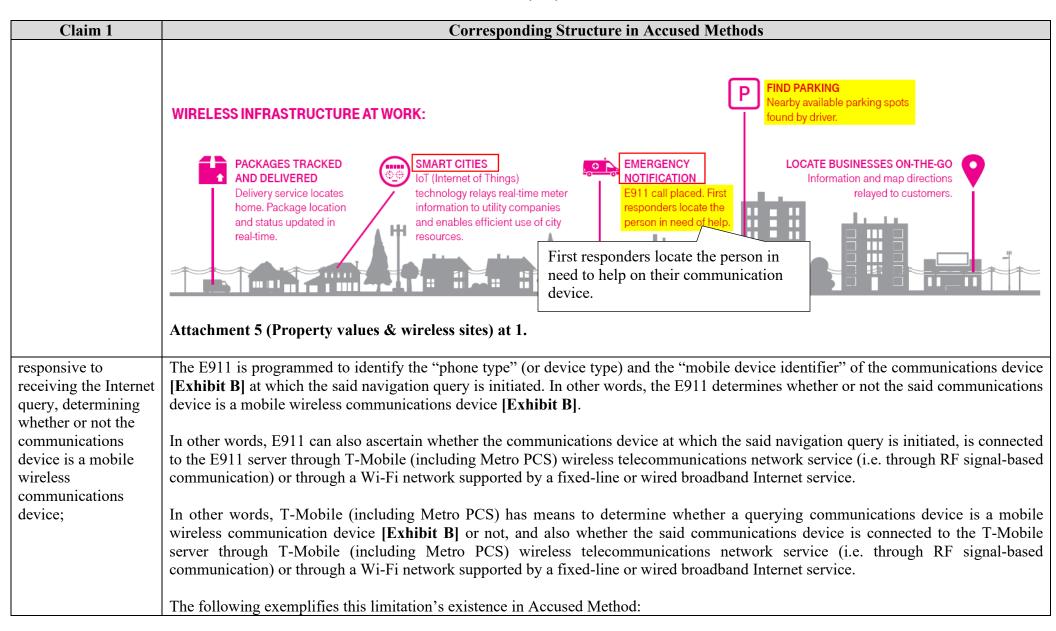
Government communications

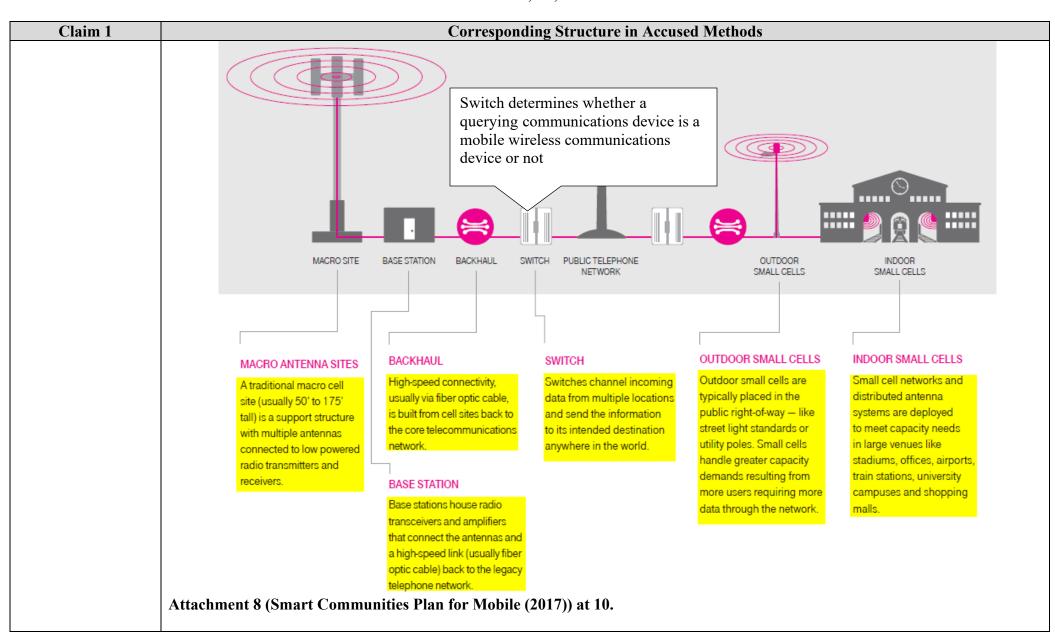
A building inspector in the field spots a problem in a major construction project — potentially requiring a shutdown. He is able to use his T-Mobile tablet to video the area of concern plus quickly turn relevant paperwork into digital documents — all of which he sends wirelessly to supervisors for immediate consultation.

T-Mobile offers a government communications package designed to provide field personnel with multiple voice and data communications options, whether for emergency or day-to-day operations.

T-Mobile and its trusted partners support government communications needs,* offering:

- Smartphones and/or tablets
- Wi-Fi Calling
- Enterprise messaging
- Ruggedized devices or cases
- Asset tracking (vehicle use and maintenance needs can be easily monitored)
- Push to Talk alternatives
- Radio communication options
- Applications that convert paper forms to digital format for mobile use
- Location-based services
- Private APN
- Biometrics, including facial recognition, iris scanning and fingerprinting





Claim 1 **Corresponding Structure in Accused Methods** Helping America respond to emergencies and disasters America's 911 system provides a nationwide, emergency communications service across all 50 states. Wireless carriers and wireline phone companies must meet specific standards for 911 calling as established by the Federal Communications Commission. Mobile phones play an important role in personal and public safety and can be a lifeline for people and first responders reacting to emergencies. Enhanced 911 or E911 supports wireless phone users who dial 911 making their location known to emergency E911 determines whether a **ENHANCED 911 LOCATION ACCURACY:** querying communications on 67% of 911 calls. device is a mobile wireless communications device or not. American's rely on enhanced 911 services Looking to the future In late 2014, the wireless industry and public safety advocates Next Generation 911 (NG911) will enhance the 911 system to create reached an agreement that will lead to more accurately locating faster, more flexible and resilient systems to keep up with technology indoor 911 callers. The industry is working to provide an indoor used by the public. NG911 will enable emergency reporting via text, dispatch-able location or a vertical location estimate for callers in images, video and data. high-rise buildings. Attachment 6 (Enhanced 911 for wireless callers) at 1.

Claim 1	Corresponding Structure in Accused Methods		
	The 911 Act and Federal Communications Commission Regulations	6	
	To assist the effort to provide comprehensive 911 services nationwide, Congress in 1999 passed the Wireless Communications and Public Safety Act (P.L. 106-81), often referred to as the 911 Act. This act mandated 911 as the national emergency number ²⁹ and provided for parity of wireless 9-1-1 services with the protections and authorizations already extended to wireline services. ³⁰ Among its provisions, the law required the FCC to work with the states and the many other affected parties to deploy comprehensive wireless enhanced 911 (W-E911) service. Enhanced 911 service provides 911 call centers with Automatic Number Identification (ANI) and Automatic Location Identification (ALI). ³¹ Most wireline phone services provide ANI/ALI information. ³²		
	Automatic Location Identification (ALI) provides—in the case of wireline—the address associated with the telephone number or—in the case of wireless—the approximate geographic coordinates of the caller.		
	Attachment 2 (Emergency Communications: Broadband and the Future of 911 (2010)) at 7.	T-Mobile uses	
	PSAP Interface	ALI service in E911 services.	
	Wireless Providers cannot 'push' location information PSAP	ALI is responsible for determining whether a	
	 PSAP must request ('pull') location from the ALI Service Provider 	querying	
	ALI Service Provider then 'pulls' location from Wireless Provider (GMLC/MPC)	communications device is a mobile	
	Normal Location Process	wireless	
	 Initial ALI Bid upon call reception at PSAP (often automated) – typically results Phase I (Cell ID) location 	communications device or not.	
	 Re-bid approximately 30 seconds into call (can be manual or automated) – typically results in Phase II location estimate 		
	 Re-bid can be timed from call reception or from previous ALI bid result – whichever is most convenient for the PSAP/CPE vendor Repeat re-bid process ("mid-call location update") as needed 		
	Attachment 1 (E911 Phase II Location accuracy workshop (2013)) at 2.		

Claim 1	Corresponding Structure in Accused Methods		
responsive to determining that the communications device is the mobile wireless communications device, the directional assistance service determining and using a present location of the	B], and that the said query was communicated through (i.e. through RF signal-based communication), the E91 device and uses it as the starting location for providing n Further, E911 services determine query device is wireless	query has been initiated at a mobile wireless communications device [Exhibit T-Mobile (including Metro PCS) wireless telecommunications network service 1 service determines current location of the mobile wireless communications avigation information (instructions or directions) to travel to the destination. ss or wireline. Then it determines the location of the device. If querying device mobile device to the first responder. [Refer attachment: 5 and 11] Accused Method:	
mobile wireless communications device as a location	911 wireless services	need infrastructure	
of the communications	Mobile phones play an important role in pe	ersonal and public safety. Mobile connectivity can be a	
device;	lifeline for people in need and first respond	ders. Enhanced or E911 seeks to improve the accuracy and	
	reliability of wireless 911 calls and this will	require network upgrades and coordination among public	
	safety agencies, wireline and wireless carri	ers, and equipment manufacturers.	
	Attachment 5 (Property values & wireless sites) at 2.	T-Mobile's E911 services first determine the query device is wireless or wireline. Then it determines the location of the device.	

Claim 1	Corresponding Structure in Accused Methods	
	Location-Based Services	
	If your device is turned on, our network is collecting data about the device location. We use this network location	
	data to operate and improve our network and business, including to route wireless communications, and provide	
	emergency responders information about how to find you when you call 911 We do not share network location	
	data with third-parties, other than emergency responders or as required by law or emergency.	
	Depending on your device, you may be able to obtain services (such as mapping or ride-sharing service) that use	
	the location of your device. These services, referred to as Location-Based Services ("LBS"), are generally provided	
	by third-parties in connection with apps or websites. Third-party LBS providers generally use your device	
	operating system's location capabilities, which can determine location independent of our network, to derive	
	device location. It is important that you understand the location capabilities and settings of your device and the	
	privacy policies and terms under which third-party LBS are provided.	
	In some cases, T-Mobile may provide LBS services. Where we do so, we will request your permission before we	
	access precise location data to support the service. If you have previously consented to our app or service	
	accessing precise location data, you may revoke that permission at any time through the device's operating	
	system location preference controls or the app settings. You may also follow the standard uninstall process to	
	remove the app from your device. Attachment 11 (T-Mobile Privacy Statement (2019)) at 10, 11.	

Location Technology Cascade	
the PSAP	

Claim 1 **Corresponding Structure in Accused Methods** Helping America respond to emergencies and disasters America's 911 system provides a nationwide, emergency communications service across all 50 states. Wireless carriers and wireline phone companies must meet specific standards for 911 calling as established by the Federal Communications Commission. Mobile phones play an important role in personal and public safety and can be a lifeline for people and first responders reacting to emergencies. Enhanced 911 or E911 supports wireless phone users who dial 911 making their location known to emergency E911 determines whether a **ENHANCED 911 LOCATION ACCURACY:** querying communications on 67% of 911 calls. device is a mobile wireless communications device or not. American's rely on enhanced 911 services Looking to the future In late 2014, the wireless industry and public safety advocates Next Generation 911 (NG911) will enhance the 911 system to create reached an agreement that will lead to more accurately locating faster, more flexible and resilient systems to keep up with technology indoor 911 callers. The industry is working to provide an indoor used by the public. NG911 will enable emergency reporting via text, dispatch-able location or a vertical location estimate for callers in images, video and data. high-rise buildings. Attachment 6 (Enhanced 911 for wireless callers) at 1.

Claim 1	Corresponding Structure in Accused Methods
responsive to	As mentioned previously, the E911 is programmed to identify the "phone type" (or device type) of the communications device [Exhibit]
determining that the	B] at which the said navigation query is initiated, and also to ascertain whether the communications device [Exhibit B] at which the
communications	said navigation query is initiated, is connected to the E911 server through T-Mobile (including Metro PCS) wireless
device is not the	telecommunications network service (i.e. through RF signal-based communication) or through a Wi-Fi network supported by a fixed-
mobile wireless	line or wired broadband Internet service.
communications	
device, obtaining a	In other words, the E911 has means to determine whether a querying communications device is a mobile wireless communication
fixed location	device [Exhibit B] or not, and also whether the said communications device is connected to the E911 server through T-Mobile
associated with the	(including Metro PCS) wireless telecommunications network service (i.e. through RF signal-based communication) or through a Wi-Fi
communications	network supported by a fixed-line or wired broadband Internet service.
device to determine	
the location of the	This clearly indicates that if the said communications device is determined by E911 service to be a stationary or fixed communications
communications	device [Exhibit B] connected or tethered to a Wi-Fi (internet) access point, modem, router or a Wi-Fi hotspot supported by a fixed line
device; and	(wired) broadband Internet Service, E911 determines the location of the said stationary or fixed communications device [Exhibit B] by
	identifying the Internet Service Provider or Wi-Fi hotspot serving the said communications device, and obtaining the stationary location
	of the said Wi-Fi (internet) access point, modem or router supported by the said Internet Service Provider or Wi-Fi hotspot, from a Wi-Fi database, Wi-Fi location database or a Wi-Fi hotspot database.
	r I database, WI-r I location database of a WI-r I libispot database.
	Further, T-Mobile (including Metro PCS) provides E911 services as per FCC standard. Enhanced 911 service provides 911 call centers
	with Automatic Number Identification (ANI) and Automatic Location Identification (ALI). T-Mobile (including Metro PCS) uses ALI
	service provider in E911 services. In the case of wireline Automatic Location Identification (ALI) provides the address associated with
	the telephone number and in the case of wireless the approximate geographic coordinates of the caller. [Refer attachment 7, 1, 2]
	1
	The following exemplifies this limitation's existence in Accused Methods:

Claim 1	Corresponding Structure in Accused Methods		
	911 wireless services need infrastructure		
	Mobile phones play an important role in personal and public safety. Mobile connectivity can be a		
	lifeline for people in need and first responders. Enhanced or E911 seeks to improve the accuracy and reliability of wireless 911 calls and this will require network upgrades and coordination among public safety agencies, wireline and wireless carriers, and equipment manufacturers.		
	T-Mobile's E911 services first determine the query device is wireless or wireline. Then it determines the location of the device.		
	Attachment 5 (Property values & wireless sites) at 2.		

Claim 1	Corresponding Structure in Accused Methods	
	Wireless 9-1-1 ~ Current Status in Florida	
	❖T-Mobile has completed Phase I & II service deployment for all Florida PSAPs that have requested service to date. Still awaiting a Phase I & II request letter from Franklin County.	
	Florida Counties with no T-Mobile coverage at this time: Gilchrist and Union.	
	❖The T-Mobile network processes about 90,000 wireless voice 9-1-1 calls per day, currently providing Phase I & II service to 3,600 PSAPs nationwide.	
	❖Important that the PSAP calltaker perform a rebid/retransmit if the wireless 9-1-1 call arrives at the PSAP as Phase I (WPH1) to provide the Phase II data (WPH2). T-Mobile E911 services meet the FCC standard in Florida USA	
	❖T-Mobile continues to meet ¬quired location accuracy	
	benchmarks set by the FCC on a county-by-county level.	
	❖T-Mobile generates daily reports from its GMLC	
	and reviews network performance reports to determine	
	if there are any technical issues that need to	
	be investigated and mitigated with the PSAP.	
	Attachment 7 (T-Mobile Text to 9-1-1 Services (2014)) at 3.	

Claim 1	Corresponding Structure in Accused Methods	
	The 911 Act and Federal Communications Commission Regulatio	ns
	To assist the effort to provide comprehensive 911 services nationwide, Congress in 1999 passe the Wireless Communications and Public Safety Act (P.L. 106-81), often referred to as the 911 Act. This act mandated 911 as the national emergency number ²⁹ and provided for parity of wireless 9-1-1 services with the protections and authorizations already extended to wireline services. ³⁰ Among its provisions, the law required the FCC to work with the states and the man other affected parties to deploy comprehensive wireless enhanced 911 (W-E911) service. Enhanced 911 service provides 911 call centers with Automatic Number Identification (ANI) a Automatic Location Identification (ALI). ³¹ Most wireline phone services provide ANI/ALI information. ³² ³¹ Automatic Number Identification (ANI) recognizes and displays the telephone number from which the call is pla Automatic Location Identification (ALI) provides—in the case of wireline—the address associated with the telephone number or—in the case of wireless—the approximate geographic coordinates of the caller.	d nd ced.
	Attachment 2 (Emergency Communications: Broadband and the Future of 911 (2010)) at 7.	T-Mobile uses
	PSAP Interface	ALI service in E911 services.
	Wireless Providers cannot 'push' location information to the PSAP	ALI is responsible for determining the location of
	PSAP must request ('pull') location from the ALI Service Provider	Wireline or
	ALI Service Provider then 'pulls' location from Wireless Provider (GMLC/MPC)	wireless device.
	Normal Location Process	
	 Initial ALI Bid upon call reception at PSAP (often automated) – typically results in Phase I (Cell ID) location 	1
	 Re-bid approximately 30 seconds into call (can be manual or automated) – typically results in Phase II location estimate 	
	 Re-bid can be timed from call reception or from previous ALI bid result – whichever is most convenient for the PSAP/CPE vendor Repeat re-bid process ("mid-call location update") as needed 	
	Attachment 1 (E911 Phase II Location accuracy workshop (2013)) at 2.	

Claim 1	Corresponding Structure	in Accused Methods
the directional assistance service providing navigation information to the	In response to receiving the navigation query (which includes input directed via the Internet, E911service computes and provides the navig to travel from the current location of the said communications device to	gation information (directions) to the said communications device
communications device in response to the Internet query, wherein the navigation provides	Further, enhanced 911 (also called E911) is a federally-mandated prog 911 by providing dispatchers with additional location information. E9 is initiated by jurisdictional request. The deployment of E911 requagencies, wireless carriers, technology vendors, equipment manufactures.	11 is regulated by the Federal Communications Commission and uires network upgrades and coordination among public safety
directions for proceeding from the	The following exemplifies this limitation's existence in Accused Method	
location of the communications device to a location of the destination.	WIRELESS INFRASTRUCTURE AT WORK:	P FIND PARKING Nearby available parking spots found by driver.
	PACKAGES TRACKED AND DELIVERED Delivery service locates home. Package location and status updated in real-time. Attachment 5 (Property values & wireless sites) at 1.	EMERGENCY NOTIFICATION E911 call placed. First responders locate the person in need of help. First responders locate the person in need to help on their communication device.

Claim 1	Corresponding Structure in Accused Methods
	Over the past twenty years, wireless carriers, manufacturers, and the public safety community,
	have collaborated to develop solutions for a number of exceptionally difficult problems, including
	how to route cellular 911 calls to the correct public safety answering point (PSAP), to complete
	911 calls for non-subscribers, and to allow first responders to locate callers who are unable to
	tell the PSAP where they are. As technologies and wireless coverage have improved, the
	carriers and PSAPs have continued to enhance these solutions, deploying increasingly robust
	location, routing, and call completion capabilities.
	Attachment 10 (A Wireless 911 Indoor Location (2014)) at 1.
	In addition to implementing dispatchable location solutions for indoor calls, the Roadmap also
	contains clear, measurable commitments to improve traditional latitude/longitude location
	solutions for outdoor calls and for indoor calls where a dispatchable location may not be
	available. In this regard, the agreement provides for developing, testing and deploying
	technologies that will improve the accuracy and reliability of location information anytime
	somebody calls for help, by using the most advanced satellite navigation systems and features
	of our LTE broadband network, as well as Wi-Fi and Bluetooth beacons.
	Id. at 2.

Claim 1	Corresponding Structure in Accused Methods
	Information Provided Upon PSAP Request
	Location Estimate
	Latitude/Longitude estimate of caller (Phase II), or
	• Serving Cell/Sector Information (Phase I) – typically in the form of a street address
	Class of Service (COS)
	 "WRLS" – Phase I Result from a Phase I Deployment
	"WPH1" – Phase I Fallback for a Phase II Deployment
	"WPH2" – Phase II Result
	Uncertainty Estimate
	 Provided with each E911 location estimate to all PSAPs requesting this option – allows the calltaker to gauge the quality of the location estimate in real time
	 Radius (in meters) of a circle centered at the reported position (latitude/longitude) within which the caller's actual location is expected to fall 90% of the time (where 90% is the associated confidence level)
	 Confidence level is suppressed (not transmitted to the PSAP) – per public safety request
	 90% confidence level is recommended by ESIF and public safety
	Attachment 1 (E911 Phase II Location accuracy workshop (2013)) at 3.

im 1		Corresponding Struct	ure in Accused Methods
	330 Mill	ion Americans Rely on Enhanced	Looking to the Future
	911 Ser	vices	According to 911.gov:
	allowing peor or friends. Mo responders w	es play an important role in personal and public safety, ble to easily reach out to emergency services, family bile connectivity can be a lifeline for people and first then reacting to natural and man-made disasters, as well as dithreats to communities.	For more than 40 years, the 911 system has served the needs of the public in emergencies. Next Generation 911 (NG911) will enhance the 911 system to create a faster, more flexible, resilient, and scalable system that allows 911 to keep up with communication technology used by the public.
	seeks to impr dispatchers v	911 (also called E911) is a federally-mandated program that inprove the accuracy and reliability of wireless 911 by providing its with additional location information. E911 is regulated by the communications Commission and is initiated by jurisdictional	While the technology to implement NG911 systems is available now, the transition to NG911 involves much more than just new computers. Implementing NG911 will include activities of many people, who will coordinate efforts to plan and deploy a continually evolving system of hardware, software, standards, policies, protocols and training.
	First responder gets the location information on their communication device.	nt of E911 requires network upgrades and coordination safety agencies, wireless carriers, technology vendors, nufacturers, and local wireline carriers.	The National 911 Program supports the effort of jurisdictions at all levels of government as they consider the transition to NG911. New technologies and policies will continue to enhance these
ea fro <i>Nu</i>	each year, ar from wireless Number Asso	alls are made to 911 in the U.S. ad in many areas 80% or more are a devices. (National Emergency ociation, NENA) Communities plan for mobile) at 1.	capabilities. In fact, a roadmap agreement reached by the wireless industry and public safety advocates in late 2014 will lead to more accurately locating indoor 911 callers, as well as providing a vertical estimate for callers in high-rise buildings.